

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

REENA S. MATHEW,

Plaintiff,

VS.

SANTANDER CONSUMER USA INC.,

Defendant.

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CIVIL ACTION NO. 3:23-CV-01494-BW

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE ITS REPLY IN SUPPORT OF ITS
MOTION FOR SUMMARY JUDGMENT**

TO THE UNITED STATES CHIEF DISTRICT JUDGE DAVID C. GODBEY:

Defendant Santander Consumer USA Inc. (“Santander”) files this Unopposed Motion for Extension of Time to File Its Reply in Support of its Motion for Summary Judgment (“Unopposed Motion”).

I.

Plaintiff Reena Mathew (“Mathew”) filed Plaintiff’s Motion and Brief in Support of Plaintiff’s Response to Defendant’s Motion for Summary Judgment on September 20, 2024. Doc. Nos. 34–35. Mathew’s Brief in Support of Plaintiff’s Response to Defendant’s Motion for Summary Judgment (“Response Brief”) consists of 50 pages, and her Appendix in Support of Plaintiff’s Response to Defendant’s Motion for Summary Judgment (“Appendix”) consists of over

400 pages.¹ *See* Doc. Nos. 35–37. Included in Mathew’s Appendix is her 35-page declaration. *See* Doc. No. 36 at 2–36.

Pursuant to Rule 7.1(f) of the Local Civil Rules of the Northern District of Texas, Santander’s reply in support of Defendant’s Motion for Summary Judgment is due on October 4, 2024, unless otherwise directed by the Court.

II.

Santander respectfully requests a one-week extension of the deadline by which it must file its reply in support of Defendant’s Motion for Summary Judgment. Santander seeks this extension to give it adequate time to complete its assessment and analysis of Mathew’s lengthy Response Brief, Appendix, and declaration, perform the necessary research, and finalize the drafting of its reply brief.

Mathew is not opposed to the relief sought herein.

This request is not for delay, but so that justice may be done.

PRAYER

Based on the foregoing, Santander respectfully requests that the Court grant this Unopposed Motion and extend to October 11, 2024, the deadline by which Santander must file a reply in support of Defendant’s Motion for Summary Judgment.

¹ Santander is not suggesting a criticism of the length of Mathew’s Brief or Appendix, as Santander recognizes that Defendant’s Brief in Support of Its Motion for Summary Judgment and accompanying appendix are extensive as well.

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

On October 1, 2024, I discussed the relief sought herein with Plaintiff's counsel. Plaintiff's counsel has communicated that Plaintiff is not opposed to the relief sought herein.

Monte K. Hurst
Monte K. Hurst

CERTIFICATE OF SERVICE

I certify that on October 2, 2024, I served a copy of the foregoing document on Plaintiffs' counsel as follows via e-mail message in compliance with Rule 5(b) of the Federal Rules of Civil Procedure:

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